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MAY 7, 2019

Hon. Steven M. Gold

Re: Edward Shin v YS2 Enterprises, Inc.
Case No. 1:17-cv-05183(ILG)(SMG)

Dear Judge Gold:

The firm represents plaintiff, Edward Shin. I make this updated status report in advance of our June 28, 2019 conference.

As required by this Court's January 2, 2019 order, Plaintiff has produced his damages and liability reports. There are still four short fact depositions that need to be taken, three of which are of non-parties represented by me. All are expected to be completed within the time allotted for fact discovery.

However, Mr. Shin underwent an additional, unscheduled surgery today for his injuries suffered in the accident at issue in this matter. As a result, there will be substantial additional medical information and one or more amendments to the damages reports previously provided. I will therefore be requesting an extension of expert discovery for at least 30 days once I receive the preliminary results of the surgery. Plaintiff would necessarily consent to have the date set for the defendants' rebuttal damages reports, currently May 15, 2019, moved so that defendants are not required to file multiple damages reports.

One additional report: I have made a settlement demand for Mr. Shin and await responses.

Respectfully submitted,

/s Robert J. Basil

Robert J. Basil